

FILED 25 JUN '20 10:48 AM D.C. OR

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Todd Edward Dickinson

(Enter full name of plaintiff)

Plaintiff,

Civil Case No. 6:20-cv-1018-AA
(to be assigned by Clerk's Office)COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)

Jury Trial Demanded

☒ Yes☐ No

Linn County Jail
Linn County Sheriff Jim Von
Linn County Undersheriff John Doe
L.C. Jail Captain Langley #339
L.C. Jail Captain Vian
L.C. Jail (Enter full name of defendant(s))
L.C. Jail Senior Deputy SOTO classification
Defendant(s). cont on 1B

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

current →

Name: Todd E. DickinsonStreet Address: 1115 Jackson St. S.E.City, State & Zip Code: Linn County Jail
Albany, Oregon 97322

Telephone No.: _____

Q OF Todd Dickinson
3235 Madison St. S.E.
Albany Oregon 97322
Home (541) 248-3973

City of Albany Oregon
in Linn County Oregon

County of Linn
IN THE STATE OF OREGON

Defendant No. 1

Name:

Linn County Jail

Street Address:

1115 Jackson St. S.E.

City, State & Zip Code:

Albany, Oregon 97322

Telephone No.:

?

Defendant No. 2

Name:

Linn County Sheriff Jim Yon

Street Address:

1115 Jackson St. S.E.

City, State & Zip Code:

Albany, Oregon 97322

Telephone No.:

?

Defendant No. 3

Name:

Linn County Undersheriff Jane/John Doe

Street Address:

1115 Jackson St. S.E.

City, State & Zip Code:

Albany, Oregon 97322

Telephone No.:

?

Defendant No. 4

Name:

Linn County Jail Captain Langley #539

Street Address:

1115 Jackson St. S.E.

City, State & Zip Code:

Albany, Oregon 97322

Telephone No.:

?Continued
on 2B**II. BASIS FOR JURISDICTION**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

L.C. Jail Captain Vian
1115, Jackson St. S.E.
Albany, Oregon 97322

L.C. Jail Lt. Randall
1115 Jackson St. S.E.
Albany, Oregon 97322

Linn County Senior Deputy Soto classification officer
1115 Jackson St. S.E.
Albany, Oregon 97322

Officer of
Albany, Oregon 97322
in Linn County

County of Linn
in the State of Oregon

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

8th amendment (Failure to protect), ORS Assault
 The first 10 amendments of Constitution. 14th Amendment of Constitution

III. STATEMENT OF CLAIMS

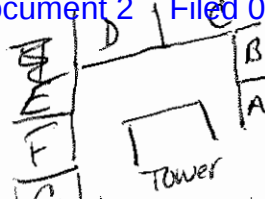
Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

In November 2019 Plaintiff was housed in "D" Block a privileged block. While standing under t.v. I saw inmate Cheever attempting to say something. I stepped out from under the t.v. and he sucker punched me with a huge right hand. Broke my glasses causing swelling & bruising to my left ear and neck and jaw area 30+ days of pain - some loss of hearing. Plaintiff (I) picked up my broken glasses went to my room and juryrigged them back together and walked back to dayroom. Inmate Cheever walked up behind another inmate (watching t.v.) and as the inmate turned Cheever punched him literally knocking him out. All on video (4K)

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Cheever, being held for murder, beating and kicking an elderly man to death should never have been place in



"D" block again. Yes again. He assaulted another inmate previously in D block and was removed and put in B block. While in B block he bolted out of the door during med line, ran across to "F" block and assaulted an inmate in F block. All of this prior to assaulting me and the other individual. Then he was put back in "D" block a privilege block again why? I was assaulted then as well as another resident. Claim II

On 05-12-2020 (approx 6:30 am again on video) while I was reaching out to retrieve toilet paper Deputy Lt. Randall struck

~~CLAIM III~~

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

assaulted me. every morning the supply cart comes around to get supplies. I have never been assaulted or disrespected, dehumanized for reaching for toilet paper. I have IBS and use approximately 1 @ 1 1/2 rolls a toilet paper a day. I have wrote letters to the Sheriff, Undersheriff Lt. Langley. Langley responds that I have t.p. when check on - of course he doesn't ask when I got it. Being denied t.p. is unsanitary and unhealthy. I ~~sh~~ surely shouldn't be assaulted by a deputy for following the rules and retrieving t.p. from the cart.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

mental and emotional injury 1,150⁰⁰ a day and counting.

nominal damages 10,000,000.00

punitive damages 100,000,000.00

change their procedure for housing accused murderers who beat and kick their victims to death. Then assault incarcerated residents, at will seemingly with permission of this facility.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 22 day of June, 2020.

(Signature of Plaintiff)

1000 E. DICKINSON